



July 22, 2025

**Via ECF**

Hon. Steven L. Tiscione, U.S.M.J.  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

**Re:   *Lock v. Costco Wholesale Corp.*  
      Case No. 23 Civ. 7904 (SJB) (ST)**

Dear Judge Tiscione,

Plaintiffs write with Defendant's consent to respectfully request a 60-day adjournment of the time to complete pre-certification discovery and initiate the anticipated motion for class certification.

The Parties are working diligently to complete paper discovery related to class certification. In response to Plaintiffs' demands, Defendant has produced over 2500 pages of documents. In response to Defendant's demands Plaintiffs have produced about 670 pages of documents. The Parties have met and conferred on several occasions to work through discovery disputes and are still working to complete their productions. The Parties have also answered each other's interrogatories.

The Parties have completed several depositions and are working to schedule additional depositions. To date, Defendant has deposed Plaintiffs Lock, Straker, Lohnes, and McCumber. Plaintiff Nickich's deposition is in the process of being rescheduled. Plaintiff noticed a 30(b)(6) deposition and has worked with Defendant to clarify the subject areas of the deposition. The Parties are now working to schedule the 30(b)(6) witnesses, once designated. Plaintiffs intend to notice additional witnesses once Defendant has designated 30(b)(6) witnesses. Defendant joins this extension request for the two depositions that have already been noticed and opposes an extension to the extent that Plaintiffs would notice new depositions during the pre-certification phase of discovery.

Considering the paper discovery and depositions to be completed, Plaintiffs respectfully request that the Court: (1) extend the time to complete class certification discovery from July 25 to September 23; and (2) extend the time for Plaintiffs to initiate their class certification motion from August 22 to October 21.



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This is our first motion to extend these deadlines. No other deadlines will be affected by granting this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tana Forrester', written over the printed name.

Tana Forrester

cc: Counsel of Record (via ECF)